



EPA ACE Pilots: Now is the Time!

Software Developers Conference

Washington, DC

March 27, 2015



Topics

- Pilot Overview
- Filing Options for EPA Message Sets
- Pesticides Notice of Arrival Pilot
- PGA Message Set Sample
- Updates to EPA Guidance
- Getting Started
- Testing Tips/Improvements
- Pilot Timing
- Questions

Pilot Overview

- Current pilots

- **Vehicle and Engine Declarations Imports**

- Starting in ports of **Long Beach, Newark**

- **Hazardous Waste Exports** (*Spent Lead Acid Batteries*)

- Starting in ports of **Hidalgo, Laredo**

- **Pilot for Notice of Arrival for Pesticide Imports** (*No Earlier than April 15, 2015*)

- Test in CERT now!
 - Starting in ports of **Detroit, Port Huron, Newark**



- Planned for 2015

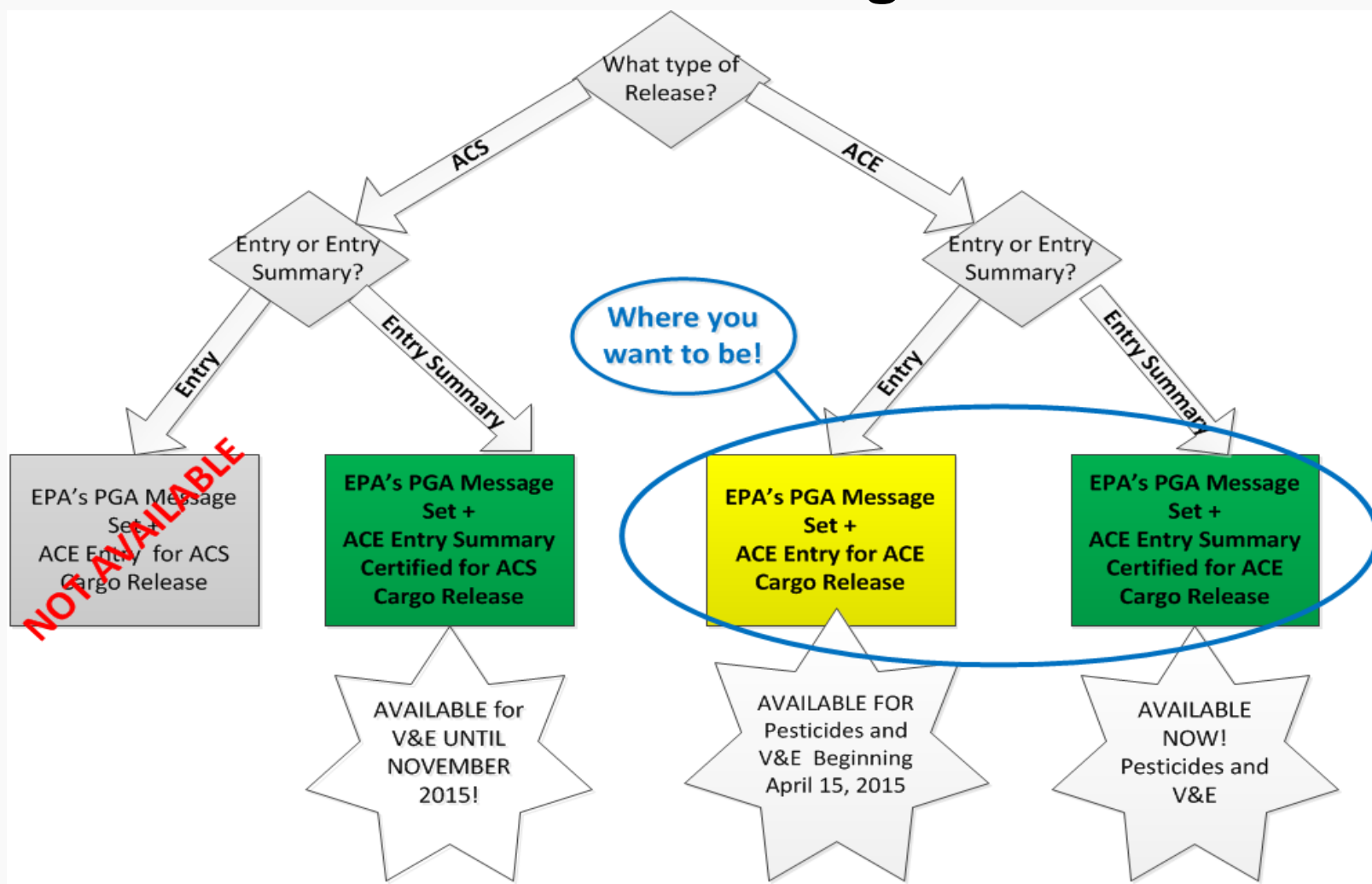
- **Ozone Depleting Substances (ODS) Imports is being wrapped into the Toxic Substance Control Act (TSCA) program**

- Expected capability in July





Options for Pre-arrival Filing EPA PGA Message Set





Notice of Arrival of a Pesticides: Pilot Highlights

Streamline, improve reporting/processing of legal imports/exports

Current Process: may take days to weeks and includes mailing/courier fees.

New Process:

- ***Pre-Arrival*** up to 60 days before arrival
- ***Pesticides Label*** provided in *DIS* (importer has this information)
- ***PGA Message Set*** of the data elements submitted on the paper Notice of Arrival (NOA) of a Pesticide
- ***Automated Review/Validations*** for key elements, including Pesticide Registration Number, Producer Establishment Number
- ***Electronic status messaging*** – ABI messages (including errors and clearance)



Sample Pesticide PGA Message Set

OI CHEMICAL IN MAKING PRESSURE TREATED LUMBER
PG01001EPAPS1 Y
PG02PCAS 312600-89-8
PG04YBIS-(N-CYCLOHEXYLDIAZENIUMDIOXY)-COPPER 1000000
PG07CU-HDO
PG14 EP8241-420
PG19EPN 012345CHN002
PG19CB SUPER CUSTOMS BROKERAGE COMPANY 500 EAST 17TH STREET
PG20 100 NEW YORK NY US10012
PG21CB JOHN SMITH 2022345678 JOHN.SMITH@SUPERBROKERAGE.COM
PG19IM BUG SPRAY IMPORT COMPANY 345 NEWBERRY STREET
PG20 203 BOSTON MA US02105
PG21IM JANE SMITH 6172345678 JANE.SMITH@BUGSPRAYIMPORT.COM
PG55NP CI
PG19OV MARITIME INDUSTRIAL SHIPPERS 600 PORT ROAD
PG20 NEWARK NJ US20034
PG21OV JAY SMITH 4101123456 JAY.SMITH@MARITIMESHIPPERS.COM
PG19DEQ SUPERIOR SHIPPING COMPANY 432 PORT BOULEVARD
PG20 LAPU-LAPU CITY PH323402486
PG21DEQJOHN REYES 63324115800 JOHN.REYES@SUPERIORSHIPPING.PH
PG19LG FAMOUS STORAGE AND WAREHOUSE 12345 JERSEY AVE
PG20 NEWARK NJ US07310
PG21LG Carl Fitz 5052222334 CARL.FITZ@FAMOUSSTORAGE.COM
PG22 944 CI EP3 Y02112014
PG261000000100000BO
PG262000000002840OZ
PG29KG 000000080656



Supplemental CATAIR Updates (Pesticides)

- **Location of Goods** : Corrected the header “Location of goods after examination” to “Location of Goods for Examination after importation”.
- **Pesticide Label** : Clarified DIS filing requirement to explain that a Pesticide Label is required to be submitted along with an Entry and Pesticides (NOA) PGA message set.
- **Product/Components**: Clarified that, when a product is comprised of a singular chemical component, all data should be reported at the Product level; but if a product is comprised of multiple chemical components then the components (i.e. Active Ingredients) should be reported at the component level.
- **Registration No./LPCO**: Removed LPCO Transaction Type code from the PG14 record. (single use, general, continuous)
- **Data Map Update**: Included the ‘Notify Party’ data element in the “ Pesticides Data Map from Existing EPA Form 3540-1”.



Getting Started

- ***Be an ACE Filer*** - Talk to your CBP Client Rep.
- ***File these commodities at these ports to start***
 - *HTS Codes (Chapters 29, 38, 84, 85, 86, 87, 89 initially) to be provided*
- ***Construct message sets to file***

Updated CATAIR documentation, additional information:

<http://www.cbp.gov/trade/ace/catair#field-content-tab-group-tab-4>
- ***What you need to file (boiled down):***
 - Vehicle/Engine Declaration: Data from forms 3520-1 and 21; certification number
 - Pesticides Notice of Arrival: Data from form 3540-1; Pesticide label; registration, producer establishment number
 - Hazardous Waste Exports: Consent number
- ***Test in Certification environment***
 - File PGA Message Set test cases (limited number)
 - Receive messages for errors
 - Receive EPA feedback on filing (*we will work with you one-on-one*)
- ***File in Production***



Testing Tips

1. **Availability of key data** for filing (electronic is best)
2. **Review CATAIR/ EPA Supplemental** ask questions, meet with EPA if needed
3. **Test samples/cases** including disclaimer
4. **Confirm active filing in CERT with Client Rep** at which ports
5. **Heads up** to CBP and EPA when starting testing
6. **Use unique entry numbers** so we can provide feedback.
7. **Feedback on messaging/timing.**
8. **Confirm active filing in PROD, Go Live!**



Improvements from Testing with Trade

After testing with trade partners in the CERTIFICATION environment, EPA and CBP have made updates or improvements to the following areas:

- ***Simplification***: Identified and reduced unnecessary data elements from EPA PGA message sets (removed LPCO transaction type code for Pesticides, duplicate elements in V&E)
- ***DIS***: EPA clarified DIS filing requirements and timing for Pesticides Label
- ***Improved Processing***: EPA and CBP improved the validation processes (based on review of processed test files from Trade in CERT)
- ***Documentation***: Clarified EPA PGA Message set formatting requirements (Product and Components for V&E and Pesticides) based on questions from Trade Testers
- ***Clarification***: EPA clarified regulatory requirements for Vehicles and Engines (Exhaust Engine Name for Test Group/Engine Family Name) and Pesticides (Notify Party, Location of Goods) based on questions from Trade
- ***Disclaimers***: Worked with CBP to correct/test updated functionality for disclaimers for PGA message sets after disclaimer testing with Trade

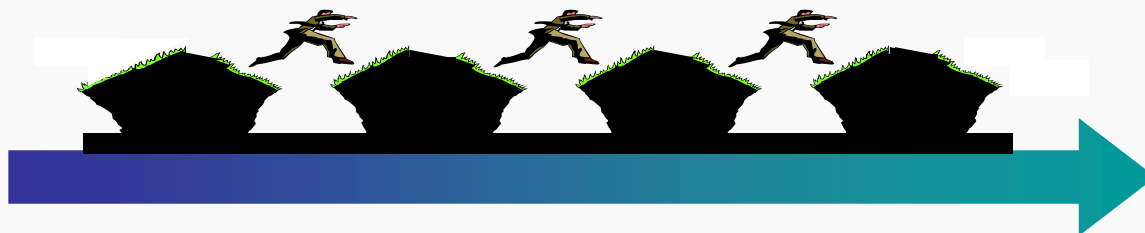


Pilot Timing

Program	Guidance Available	CERT Testing Available	Production Filing Available
<i>Imports</i>			
Vehicles & Engines	Now	Now	Now
Pesticides	Now	Now	No earlier than April 15, 2015
ODS/TSCA	Now	Summer	Fall
<i>Exports</i>			
Hazardous Waste (spent lead acid batteries)	Now	Now	Now



For More Information



Roy Chaudet

Office of Information Collection

Office of Environmental Information

U.S. Environmental Protection Agency

202-566-1703

chaudet.roy@epa.gov



Questions?



Additional Slides

**(EPA CATAIR Supplemental changes
continued)**



Supplemental CATAIR Updates (V&E)

After reviewing EPA's supplemental CATAIR documentation and PGA message set with CBP and current trade pilot participants, the following items have been clarified and updated:

- ***Product/Components*** : Clarified PG02 record description for V&E to include a description on how to use the PG02 record when reporting at the product/component level, and what records and data are typically included.
- ***LPCO/Engine Family Name*** : Clarified for V&E in a PG14 record, that the Exhaust Engine Family (EFN) and not Evaporative Engine family name is the required LPCO No. in PG14
- ***Certifying Individual*** : Identified correct order of records for V&E Certifying Individual (follows PG22 record).
- ***Components Reporting Details***: Provided additional guidance on when reporting is required at the component level for commodities imported under V&E Form 3520-21.



Supplemental CATAIR Updates (TSCA /ODS)

After reviewing EPA's supplemental CATAIR documentation and PGA message set with CBP and current trade pilot participants, the following items have been clarified and updated:

- A new section for the Toxic Substance Control Act (TSCA) has been added to the supplemental.
- The previous ODS section of the CATAIR has been condensed and included as part of the TSCA guidance section.
- No longer collect Intended Use code for ODS.
- No longer collect PG29, quantity and unit of measure, for ODS.
- Identified the correct placement for records pertaining to the Certifying Individual for TSCA Message Sets. When Reporting the CI using a single PG21, The placement should follow the PG22 record.